

**In the Matter of:**

***MCDOUGLE***

***vs.***

***NESHOBA COUNTY, MS, et. al.***

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***BRITTNEY MCDOUGLE***

***July 5, 2016***

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**Court Reporting Solutions**

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**EXHIBIT "D"**

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THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

BRITTNEY MCDOUGLE, INDIVIDUALLY, AND  
ON BEHALF OF THE HEIRS AND WRONGFUL.  
DEATH BENEFICIARIES OF MICHAEL D.  
McDOUGLE, SR., DECEASED PLAINTIFF

VERSUS CIVIL ACTION NO:3:15CV350-CWR-FKB

NESHOBA COUNTY, MS, SHERIFF TOMMY WADDELL,  
IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES,  
CITY OF PHILADELPHIA, MS, CHIEF GRANT MEYERS,  
IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES,  
AND OFFICERS BRAD CROCKETT, ERIC LOWNDES,  
BRAD POE, AND "JOHN DOES 1-6", ALL IN THEIR  
INDIVIDUAL AND OFFICIAL CAPACITIES DEFENDANTS

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DEPOSITION OF BRITTNEY MCDOUGLE

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APPEARANCES NOTED HEREIN

DATE: JULY 5, 2016  
PLACE: LAW OFFICES OF MIKE WHITE  
501 MAIN STREET  
PHILADELPHIA, MISSISSIPPI  
TIME: 10:23 A.M.

REPORTED BY: DEBORAH H. NELSON  
CSR #1256

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9 OTHERS PRESENT:

10 Ms. Mary Helen McDougale  
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1 Q Okay. Let me ask about Mr. McDougale. Do  
2 you know his date of birth?

3 A Yep, his birthday is June 14, 1985.

4 Q Okay, how far along did he make it in  
5 school?

6 A The ninth grade, tenth grade. It was one  
7 of them.

8 Q Where did he go?

9 A Philadelphia.

10 Q Did he have any vocational or technical  
11 training that you know of?

12 A I think he worked at the vo-tech, and  
13 that's about it.

14 Q Was he working anywhere at the time of his  
15 death in November?

16 A No, he was -- uh -- I worked, and he  
17 watched the children so we didn't have to pay for no  
18 babysitter.

19 Q When was the last time you know of that he  
20 had a job?

21 A Well, when we first got together, he was  
22 working. He was washing cars and stuff over there  
23 by the hospital.

24 Q Okay, was that for a specific company, or  
25 was he doing it by himself?

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1 A That is a company over that way.

2 Q Do you know what it's called?

3 A No, I do not.

4 Q That was back in 2010?

5 A Yep.

6 Q All right. Has he worked anywhere else  
7 since then?

8 A He worked little odd-and-end jobs. I  
9 mean, it's not on the record, but he did work. He  
10 worked with my daddy, and he builds houses. And he  
11 worked with his cousin, Rell, washing cars. And he  
12 worked at McDonald's.

13 Q Which McDonald's did he work at?

14 A The one over there -- uh -- in  
15 Philadelphia.

16 Q How long did he work there?

17 A I think about two weeks.

18 Q Do you remember what year that was?

19 A I don't know.

20 Q Do you know why he left employment with  
21 McDonald's?

22 A He didn't tell me.

23 Q Okay. Did he tell you why he left  
24 employment with the car washing company?

25 A No, he didn't tell me.

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1 Q Okay. In the discovery responses, it  
2 mentioned a place called Piping Company. Do you  
3 know anything about that?

4 A Nope.

5 Q Any other place you know of that he worked  
6 during the time that you were with him?

7 A Nope.

8 Q Okay. Was he on any kind of government  
9 assistance?

10 A Nope.

11 Q All right, you told me that he got out of  
12 prison in the summer of 2014, around the time y'all  
13 moved to the West Atkins residence; correct?

14 A Yep.

15 Q Did he work anywhere between the time he  
16 got out of prison and the time of his death later  
17 that year?

18 A Nope.

19 Q What did he do each day? What filled his  
20 time?

21 A He watched our kids. He got our daughter  
22 off the school bus. We just had a newborn baby. So  
23 he was watching him first. And he was cooking and  
24 cleaning the house up.

25 Q Okay. Anything else?